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RICHARD W. WIEKING
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U.S. DISTRICT COURT
NO. DIST. OF CA. S.J.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

ANOOP RAJKUMAR,

Plaintiff

v

CISCO SYSTEMS, INC., VENU DHARMAPURI,
KENNY PAUL, WIPRO TECHNOLOGIES, INC.,
DELOITTE CONSULTING LLC, NAVAL
MOHTA and VARIOUS JOHN DOES,

Defendants

Case No. C08-01600-PVT

**OPPOSITION TO DEFENDANTS
CISCO SYSTEMS, INC., VENU D
HARMAPURI, KENNY PAUL,
WIPRO TECHNOLOGIES, INC.,
DELOITTE CONSULTING LLC
NOTICE OF MOTION
AND MOTION TO DISMISS
AND ALTERNATIVELY,
MOTION FOR A MORE
DEFINITE STATEMENT**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD

Rule 8(a) of the Federal Rules of Civil Procedure states that a complaint only needs to contain "a short and plain statement of the claim showing that the pleader is entitled to relief." It is true that plaintiff does not know the exact identities of the perpetrators (Who) of these illegal actions and the exact dates when all of these illegal actions took place, plaintiff, however, is able to obtain such information during the discovery. Plaintiff has provided enough details on each

count for which he is suing defendants even though he is summarizing his complaint against each defendant.

1. As mentioned in complaint Plaintiff is suing Defendant Cisco Systems Inc., for putting him in surveillance during Oct 2004 to June 2005 while he was working there and allowing Defendant Cisco Systems Inc., Employees and Management to distribute plaintiff and his family's recorded personal conversations, including cell phone conversations (Which were recorded without his knowledge) in the office during this period.
2. As mentioned in complaint Plaintiff is suing Defendant Wipro Ltd. (erroneously sued as "Wipro Technologies, Inc.") for getting him followed, Trespassing and threatening him from July 2005 to Feb 2006
3. As mentioned in complaint Plaintiff is suing Defendant Wipro Ltd. (erroneously sued as "Wipro Technologies, Inc.") for tress passing, putting listening devices and bringing information obtained to his next work place which was J P Morgan and Chase in Lowell, MA from March 2006 to August 2006 where a team of Wipro Ltd. (erroneously sued as "Wipro Technologies, Inc.") engineers was already working before plaintiff started working there in March 2006.
4. As mentioned in complaint Plaintiff is suing Defendant Wipro Ltd. (erroneously sued as "Wipro Technologies, Inc.") and Defendant Cisco Systems Inc for putting him in

surveillance, taping his phone and Internet connections from Sept 2006 to April 2007 at his VA residence for violating his privacy and also using this information for approaching his prospective employers to make sure plaintiff is not able to get work.

5. As mentioned in complaint Plaintiff is suing Defendant Deloitte Consulting LLC for Emotional Distress.
6. This is plaintiff's believe that incidents which happened during his employment at Defendant Cisco Systems Inc during Oct 2004 to June 2005 created a business relationship problem between Defendant Cisco Systems Inc and Defendant Wipro Ltd. (erroneously sued as "Wipro Technologies, Inc.") and caused whatever happened after that, but this is subject to Investigative findings, which can be done only if this case is allowed to proceed.
7. Plaintiff is suing only one of his former employers, Defendant Cisco Systems Inc., Plaintiff never worked for Wipro Ltd. (erroneously sued as "Wipro Technologies, Inc.") and Plaintiff worked for Deloitte Consulting LLC through a subcontracting company and was never a Deloitte Employee.
8. Plaintiff will be providing details of the damages he suffered socially, financially, emotionally and how each of these acts by defendants affected his health.

CONCLUSION

For all of the foregoing reasons, plaintiff respectfully submits that the court should dismiss defendants' motion to dismiss the complaint or motion for a more definite statement.

Dated: July 22, 2008

respectfully submitted

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By: 

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